



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
March 21, 2011

Scott Armentrout  
Forest Supervisor  
Sierra National Forest  
1600 Tollhouse Road  
Clovis, CA 93611

Subject: Draft Environmental Impact Statement for the Fish Camp Project, Sierra National Forest, Madera/Mariposa Counties, CA (CEQ# 20110043).

Dear Mr. Armentrout:

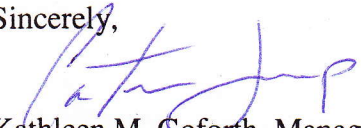
The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Fish Camp Project (project). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA acknowledges the importance of the Project's goals to improve forest health and reduce the intensity and spread of wildfires across the landscape and near communities. We recognize the ecological significance of the Sierra National Forest and support the inclusion of the resource protection measures.

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). EPA recommends the FEIS include a supplementary analysis on air emissions. Our enclosed detailed comments provide additional information regarding the concerns identified above.

We appreciate the opportunity to review this DEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and two CDs to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or [munson.james@epa.gov](mailto:munson.james@epa.gov).

Sincerely,

  
Kathleen M. Goforth, Manager  
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions  
Detailed Comments

## SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### ENVIRONMENTAL IMPACT OF THE ACTION

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### ADEQUACY OF THE IMPACT STATEMENT

#### ***Category "1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***Category "2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***Category "3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.



**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE FISH CAMP PROJECT, SIERRA NATIONAL FOREST, MADERA/MARIPOSA COUNTIES, CA March 21, 2011**

**Air Quality**

Page 170 of the DEIS discusses the Clean Air Act (CAA) attainment status for the San Joaquin Valley and Mountain Counties air basins. Some updating/corrections are needed in this section. The document states that the "San Joaquin Valley is classified by both the federal and state standards as *severe non-attainment*" this conflicts with Table 37 which correctly identifies the San Joaquin Valley as Non-attainment Extreme for 1-hour Ozone.

***Recommendation:***

The Forest Service should include current National Ambient Air Quality Standards (NAAQS), attainment designations and general conformity de minimus levels data in the FEIS.<sup>1</sup> This information changes regularly and the DEIS is incorrect for some of these items.

The project requires further general conformity analysis. The general conformity rule has been revised. The new rule was published in the Federal Register on April 5, 2010 (Volume 75, Number 64) and went into effect on July 6, 2010.<sup>2</sup>

***Recommendations:***

Given that the project is in areas of non-attainment and that the emissions exceed de minimus levels, The Forest Service should demonstrate in the FEIS how the project will ensure that applicable emissions will conform to the approved State Implementation Plans and not cause or contribute to violations of the NAAQS, in accordance with the final general conformity rule.

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<sup>1</sup> <http://epa.gov/air/criteria.html#1>  
<http://www.epa.gov/region9/air/maps/index.html>  
<http://www.epa.gov/oar/oaqps/greenbk/>  
<http://www.epa.gov/air/genconform/deminimis.html>

<sup>2</sup> <http://frwebgate1.access.gpo.gov/cgi-bin/TEXTgate.cgi?WAISdocID=bb7iTk/20/1/0&WAIAction=retrieve>